



13 March

Porirua City Council
16 Cobham Court
PO Box 50218
Porirua 5240

Attention: Hearing Commissioners for the Proposed Porirua District Plan

Dear Commissioners,

Ministry of Education - Letter to be tabled at PPDP Hearing Stream 7

The Ministry submitted on the Proposed Porirua District Plan (PPDP) in 2020. The Ministry's submission (submitter number 134) sought for provisions that enabled educational facilities throughout the relevant section of the PPDP. The Ministry requested the retention of the proposed provisions in the residential, commercial and mixed-use zones.

Subsequently, the Ministry submitted on Variation 1 in 2022 (submitter number 92), requesting changes to the residential zone provisions and the proposed Northern Growth Development Area (NGDA) to include more enabling provisions for educational facilities. The s42A Reporting Officer, Mr Rachlin, rejected the Ministry's proposed amendments on Variation 1.

In my evidence, I proposed that educational facilities are provided the same clarity in policy *RESZ-P11* as provided for Emergency Service Facilities, with the proposed revised amendment to *REZ-P11* (amendments in red).

RESZ-P11 - Non-residential activities

Provide for non-residential activities that contribute to the health and wellbeing of people and communities where:

- 1. These are compatible with the planned urban built environment and amenity of the area;*
- 2. Any adverse effects on the amenity values of adjoining sites can be adequately mitigated, including from the location and scale of utility and external storage areas;*
- 3. These do not result in adverse effects on the amenity values of adjoining sites from the movement of people and vehicles associated with the activity which cannot be mitigated;*
- 4. The hours of operation are compatible with residential amenity values; and*
- 5. For Emergency Service Facilities **and educational facilities**, the activity has an operational need or functional need to locate in the zone.*

On 7 March 2023, we contacted Mr Rachlin to better understand his position on this proposed change to *RESZ-P11*. I now have a clearer understanding of *REZ-P11(5)* which seeks to place an additional test on Emergency Service Facilities seeking to establish in the residential zone. Mr Rachlin explained the rationale for this test for Emergency Service Facilities and considered placing a similar test on educational facilities is not required and in fact will be less enabling for educational facilities. I support Mr Rachlin's views and no longer request the above change to *RESZ-P11*.



In my evidence, I also proposed the following addition to *DEV-NG-P3* to encourage a well-connected transport network that links to schools located within the Northern Growth Development Area (NGDA):

DEV-NG-P3- Potentially appropriate development

Only allow subdivision, use and development that is potentially not in accordance with the Northern Growth Development Area Structure Plan where it is demonstrated that it is appropriate for such subdivision, use or development to occur within the Development Area, having regard to whether:

- 1. The purpose and effects of the subdivision, use or development are likely to constrain, limit or compromise the intended development and use of the Development Area as set out in the Structure Plan, including consideration of:
f. Connected transport networks that allow ease of movement to, from and within the Development Area, including to existing and designated educational facilities.*

I spoke to Mr Smeaton on 8 March 2023, who is the s42A Reporting Officer for the NGDA. After reading my evidence, Mr Smeaton remained of the view that educational facilities should not be specifically referenced within *DEV-NG-P3*. The proposed provisions enable a well-connected network at a high level and if the plan was to specially recognise educational facilities, then this policy would need to specifically recognise other activities as well.

On considering this matter further, I support Mr Smeaton's position on this matter and understand that the structure plan can provide an appropriate process for the Ministry to work with Council and developer to appropriately enable educational facilities within the NGDA. Therefore, I accept the rejection of my proposed amendment to *DEV-NG-P3* as above.

Lastly, as stated in my evidence, I support the retention of the activity status for educational facilities in the mixed-use and commercial zones¹.

Since all the key submission points raised by the Ministry have been satisfactorily resolved, there is no longer a need for the Ministry to attend the hearing on Tuesday 14 March 2023. If you have any questions about the information outlined in this letter, please do not hesitate to contact me.

Kind regards,

Sian Stirling

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Date: 13 March 202

¹ Rule NCZ-R7, LFRZ-R20, MUZ-R10, and Rule LCZ-R8